



502503

BOARD OF PUBLIC WORKS OF THE COUNTY OF KENT

1500 Scribner Ave., N.W. Grand Rapids, Michigan 49504-3299

Telephone: (616) 774-3694

Facsimile: (616) 774-3338

Richard D. Buth
Jack J. Schwab
Barry A. Bittrick

Chairperson
Vice Chairperson
Secretary

Jack D. Boelema
William R. Byl
Dan Kempker
E.M. Weston

Member
Member
Member
Member

David R. Despres, P.E.
Department of Public Works

Director

**G Q D COMPLIANCE
GRAND RAPIDS**

FEB 18 1987

RECEIVED

February 17, 1987

Ms. Bonnie L. White
Environmental Quality Analyst
Groundwater Quality Division
Michigan Dept. of Natural Resources
350 Ottawa, N.W.
Grand Rapids, Michigan 49503

Re: Quarterly Inspection Reports for North Kent Landfill

Dear Ms. White:

Having reviewed the North Kent Landfill quarterly evaluations received on 1/12 and 1/14/87, we wish to make the following comments for the record.

September 30, 1986, Evaluation

Remark No. 1 - The "leachate" you mentioned was in fact a large shallow area of surface runoff created as a direct result of MDNR staff's insistence that the previously developed drainage path be eliminated to effect early site closure. For the record, the pH and Dissolved Oxygen content of this "leachate" were measured at the pond, at the end of the pump hose, at the base of the north slope prior to surface drainage system entry, at the surface water retention ponds entry and exit and at Outfall 007. In all cases, the pH was well within normal surface runoff range (7 to 9 pH units) and DO was well above 5 milligrams per liter in the 8 to 9 mg/l area. This information, along with a knowledge of the source, clearly shows that the water being discharged was not leachate. In any event, the pumping was discontinued at your direction with the result that the water was worked into the refuse face, thereby insuring its contamination and alteration to leachate.

Remark No. 2 - As stated, the fall flood rains (500 year frequency flood) virtually eliminated cover and compaction work. Also, MDNR insistence on early site closure forced the construction of difficult-to-cover thin lifts over a large area, as opposed to the smaller area deep lifts originally planned for fall (wet season) operation. Thus, it is evident that the cover condition was the result of factors beyond Department control.

Remark No. 3 - Vehicular access to the final cover area during the extremely wet conditions on the day of inspection would have resulted in damage to the already completed portion of cap.

Remark No. 4 - It has been discussed in the past that entry of surface waters to the leachate collection system is unacceptable due to the high silt content. Pumped or gravity flow of silty surface waters into the leachate collection system would likely

The "surface runoff" was in direct contact w/ refuse & therefore is considered "leachate" under RCRA. Proper grading & sloping would prevent this.

My suggestion was to pump it directly to ponds - not to the manholes, necessarily.

BOARD OF PUBLIC WORKS
OF THE COUNTY OF KENT

Ms. Bonnie L. White

Page 2

February 16, 1987

At the time of the inspection the pond levels were not exceptionally high - especially in the reach of the pond. It is assumed that the pond was pumped out prior to the inspection. This situation then preempts the high flow introduction of surface water to the leachate collection system so as not to cause raw leachate pond overflow. On this item in general, it should be made clear that the leachate collection system is not constructed with the intention of handling the high flows of surface waters which MDNR staff frequently call leachate.

Remark No. 5 - See comments for Remark No. 2 above.

Remark No. 5 - See comments for Remark No. 2 above. The pond was pumped out prior to the inspection. This situation then preempts the high flow introduction of surface water to the leachate collection system so as not to cause raw leachate pond overflow. On this item in general, it should be made clear that the leachate collection system is not constructed with the intention of handling the high flows of surface waters which MDNR staff frequently call leachate.

December 16, 1986, Evaluation

It appears from the remarks made that Part C. Surface Water Drainage, Part E. Completion of Area/Final Coverage, Part G. Leachate Control/Management and Part K. Blowing Debris, Dust and Odor Control should be marked "Compliance". With regard to the foam leachate pond cover, it had been removed during pond cleaning and is not necessary in winter due to the cold weather inhibiting organic compound volatilization from the pond.

January 7, 1987, Field Inspection Report

Good!

In general, due to the time of year, cutting and placement of clay was not possible and sandy materials were being used to cover refuse and set final garbage grade. The ruts and adjacent exposed papers noted were covered and graded shortly after inspection and all heavy equipment was shut down for the winter on or about 1/16/87.

On a more general note, you should be aware that our current earthwork contract covers the clay capping and surface restoration of the site. When weather permits, we will initiate clay cap construction, at which time you will be notified of same.

Sincerely,

KENT COUNTY DEPARTMENT OF PUBLIC WORKS

J. J. Powell

Jerry J. Powell, P.E.

Civil Engineer

JJP/cf